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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

AMBER KELLEHER,)	CASE NO. CV 13-5450
)	
Plaintiff,)	
)	
v.)	
)	FIRST REVISED STIPULATION AND
JOHN E. KELLEHER, et al,)	(PROPOSED) ORDER CONTINUING
)	DEADLINES FOR DISCOVERY AND
Defendants.)	DISPOSITIVE MOTIONS (L.R. 6-2 and 7-12)
)	

STIPULATON

WHEREAS, Plaintiff has conducted extensive written discovery and started taking deposition testimony;

WHEREAS, it has become clear to the parties that additional discovery is necessary, including the scheduling and taking of several depositions of important out-of-state witnesses that must be taken in the State of Montana;

WHEREAS, the Montana depositions must accommodate the schedules of the out-of-state witnesses;

WHEREAS, the parties are in agreement that the necessary discovery cannot be completed before the current discovery cutoff and therefore wish to request the Court to extend the deadline for close of discovery from the current March 10, 2015 to April 30, 2015;

WHEREAS, the parties have cleared a trial date with the Court and are in agreement that the matter should be tried starting on December 14, 2015;

WHEREAS, there have been no previous time modifications in the case, whether by stipulation or Court order;

NOW THEREFOR, the parties declare, stipulate and agree as follows:

- 1) All discovery shall be completed by April 30, 2015;
- 2) Any and all dispositive motions must be filed by May 28, 2015
- 3) The trial and remaining pretrial dates set by the Scheduling Order dated September 30, 2014 (Docket No. 93) shall be modified as follows:

Event	Date per Scheduling Order dated September 30, 2015	New schedule
Close of Discovery	3/10/2015	4/30/2015
Deadline to File Dispositive Motions	4/9/2015	5/28/2015
Hearing on Dispositive Motions	5/14/2015	7/2/2015 at 10:00 a.m. (Thurs)
Exchange of Pre-trial Disclosures	7/15/2015	9/30/2015
Deadline to File Pretrial Conference Statement and Related Disclosures, Motions in Limine, and Trial Briefs and Related Documents	7/30/2015	10/15/2015
Deadline to File Motions in Limine Oppositions	8/6/2015	10/22/2015
Pretrial Conference	8/20/2015	11/5/2015 at 10:00 a.m. (Thurs)
Final Pretrial Conference (FPC)	9/17/2015	12/3/2015 at 10:00 a.m. (Thurs)
Trial	9/28/2015	12/14/2015 at 9:30 a.m. (Duration: 5 days) (Mon.

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3 Dated: March 9, 2015

For Plaintiff Amber Kelleher

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5 By: /s/ Jay D. Adkisson
6 Jay D. Adkisson
7 Riser Adkisson, LLP


8 Dated: March 9, 2015

For Defendant John Kelleher

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10 By: /s/ Frederick J. Geonetta
11 Frederick J. Geonetta
12 Geonetta & Frucht, LLP
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14 PURSUANT TO STIPULATION, IT IS SO ORDERED

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16 Dated March 16, 2015

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18 By: _____
19 Maria Elena James
20 United States Magistrate Judge
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